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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION  
13

14 UNITED STATES OF AMERICA,	)	No. CR 20-70698 JCS
15	)	
16 Plaintiff,	)	STIPULATION AND [PROPOSED] ORDER
17 v.	)	WAIVING TIME UNDER SPEEDY TRIAL ACT
18 SANDRA ANN ZUNIGA,	)	AND RULE 5.1
19 Defendant.	)	
_____		)

1 With the agreement of the parties, and with the consent of the defendant, the Court enters this  
 2 order continuing the preliminary hearing date of July 16, 2020, at 9:30 a.m., to August 20, 2020, at 9:30  
 3 a.m. and documenting the defendant's waiver of the preliminary hearing date under Federal Rule of  
 4 Criminal Procedure 5.1 and the exclusion of time under the Speedy Trial Act, 18 U.S.C. 3161(b). On  
 5 June 10, 2020, the parties entered a written waiver through July 15, 2020.<sup>1</sup>

6 The parties agree, and the Court finds and holds, as follows:

7 1. The defendant is currently charged by criminal complaint. The defendant is not in  
 8 custody, having been released on an unsecured bond of \$250,000 on June 10, 2020.

9 2. The defendant agrees to an exclusion of time under the Speedy Trial Act, 18 U.S.C.  
 10 3161(h)(7)(A) & (B)(iv) to provide reasonable time necessary for effective preparation, taking into  
 11 account the exercise of due diligence.

12 3. The defendant waives the time limits of Federal Rule of Criminal Procedure 5.1 for  
 13 preliminary hearing.

14 4. Counsel for the defense believes that postponing the preliminary hearing is in her client's  
 15 best interest, and that it is not in her client's interest for the United States to indict the case during the  
 16 timeline established in Rule 5.1.

17 5. The Court finds that, taking into the account the public interest in the prompt disposition  
 18 of criminal cases, these grounds are good cause for extending the time limits for a preliminary hearing  
 19 under Federal Rule of Criminal Procedure 5.1. Given these circumstances, the Court finds that the ends  
 20 of justice served by excluding the period from June 15, 2020 through August 20, 2020, outweigh the  
 21 best interest of the public and the defendant in a speedy trial. 18 U.S.C. 3161(h)(7)(A).

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 28 <sup>1</sup> Due to an oversight, the Court signed and entered this written waiver on July 15, 2020. *See*  
 Dkt. 12.

DATED: July 15, 2020

DATED: July 15, 2020

DATED:

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